Policy on the Operation of the Video Surveillance System (CCTV)

1. Purpose

With this update, the Company informs, in accordance with Article 13 of Regulation (EU) 2016/679 (GDPR), every person entering its premises (visitors, customers, suppliers, employees, and partners) about the operation of the video surveillance system. This constitutes the "second level" of information, to which the warning signs refer (Annex A).

2. Scope

The video surveillance system of the Company's installation, Tsakalof 5, Kolonaki, 106 73 Athens.

3. Data Controller

Clue	Description
Data Manager	KELEMENIS & CO. LAW FIRM (KELEMENIS LAW)
Address	Tsakalof 5, Kolonaki, 106 73 Athens
Telephone	+30 210 3612800
Email for personal data issues	ek@kelemenis.com
Website	www.kelemenis.com

4. Purpose and legal basis of processing

The system is used exclusively to protect persons present at the premises and to safeguard the Company's assets, especially the physical client case files covered by attorney privilege, from unauthorized access, theft, or damage.

- **Legal basis:** legal interest of the Company (Article 6 paragraph 1 f of the GDPR); for employees, and Article 27 paragraph 7 of Law 4624/2019.
- **Legal interest:** The Company has an obligation to protect the security of the facilities and the confidentiality of its customers' information. The cameras cover only entry/exit and transit points where the risk of unauthorized access is greater.
- **Purpose limitation:** the system is not used to monitor or evaluate employee performance or behavior.

5. Surveillance sites and categories of data

Camera Location	Receiving Field
Admission / Reception	External entrance area
Admission / Reception	Internal entrance area
Admission / Reception	Entrance corridor
Elevator	Interior of the elevator
2nd floor	Conference room entrance
3rd floor	Elevator entrance
3rd floor (2 cameras)	Common areas of the floor
4th floor	Common area of the floor
Rooftop	Rooftop entrance

- Only image (video) with date and time is collected. No audio is recorded.

- No facial recognition or other biometric processing is applied.
- There are no cameras in lawyers' offices, client meeting rooms, staff rest areas, or restrooms. The cameras do not receive footage of computer screens or documents at workplaces.
- The cameras do not cover public spaces (sidewalks, streets) beyond what is absolutely necessary for monitoring the entrance.

6. Recipients

- Authorized persons of the Company, who are bound by a confidentiality obligation. Access to the material is recorded.
- The installation/maintenance company of the system, as the processor, is only for technical support and under contract under Article 28 of GDPR.
- Competent judicial, prosecutorial, and police authorities, when they lawfully request the material or when the Company forwards it for the investigation of a criminal act.
- The victim or perpetrator of a criminal act, only when the material constitutes evidence of the act.

No data transmission takes place outside the European Economic Area.

7. Maintenance period

The material is kept for fourteen (14) days and then automatically deleted with the entry of new material. If an incident is detected during this period, the relevant section is isolated and maintained for up to one (1) more month for its investigation and the initiation of legal proceedings. If the incident concerns a third party, the section is maintained for up to three (3) more months. When judicial proceedings are pending, the material is maintained for as long as it lasts.

8. Rights of subjects

Each registered person has the following rights:

- **Access:** to receive confirmation and a copy of the material depicted (Article 15 of GDPR);
- **Restriction:** to request the retention of the material beyond the period of retention, e.g., when it is necessary to exercise a legal right (Article 18 of GDPR);
- **Objection:** to oppose processing for reasons related to its particular situation (Article 21 of GDPR);
- **Deletion:** to request the deletion of the material (Article 17 of GDPR).

Rights are exercised by request on ek@kelemenis.com or in writing at the Company's address. To locate the material, the request must state the date, approximate time, and place where the person was found, as well as information allowing identification (e.g., photograph or description). The Company responds within one (1) month. The deadline may be extended by two (2) months, as provided by Article 12 of the GDPR, and the applicant is informed accordingly.

In response to an access request, the faces of third parties depicted in the material are hidden (e.g., image blur). If this is not possible, the material is displayed without the provision of a copy.

Complaint: Anyone also has the right to file a complaint with the Hellenic Data Protection Authority (Kifisias 1-3, 115 23 Athens, www.dpa.gr, tel. 210 6475600).

9. Safety measures

Access to the DVR recording system is allowed only to authorized persons with personal credentials. The equipment is located in a controlled access area. System accounts are periodically reviewed (DIA-09, ENT-08).

10. Related documents

- POL-10 "Physical Safety and Clean Office – Display Policy"
- POL-11 "Policy of Retention, Deletion, and Destruction of Information"
- POL-13 "Legal Compliance, Data Protection, and Attorney Confidentiality Policy"
- ENT-04A "Data Processing Annex (DPA) – Article 28 GDPR"
- MIT-07 "Processing Activity Archive (ROPA)" – DE-11
- EDPD Guidelines 3/2019 on the processing of personal data via video devices

11. Revision

The update is reviewed at least annually, as well as at every system change (new camera, change of location or shooting field, change of process owner). The current version is posted on www.kelemenis.com/ CCTV_policy and is available in printed form at the Secretariat.

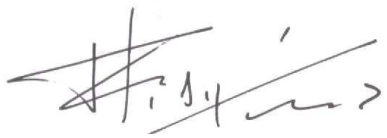
Appendix A – Text of the warning sign

The sign is placed in a visible spot before entering the supervised area, so it is visible before registration.

Plate Field	Text
Title	ATTENTION – THE AREA IS UNDER VIDEO SURVEILLANCE CONTROL
Data Manager	KELEMENIS & CO. LAW FIRM, Tsakalof 5, 106 73 Athens, tel. 210 3612800
Purpose	Protection of persons and assets
Legal basis	Legal interest (Article 6 paragraph 1 6 of the GDPR)
Retention period	14 days, except in the case of an incident
Rights	Access, restriction, opposition, deletion, complaint to the HDPA Office
Reference	For more detailed information and for exercising the rights of Regulation (EU) 2016/679 (GDPR), we refer you to: www.kelemenis.com/CCTV_policy · to the Secretariat · enquiries@kelemenis.com

Athens, 23/11/2026

For KELEMENIS AND PARTNERS LAW FIRM



Ioannis Kelemenis – Managing Partner